NOTICE OF 30-DAY PERIOD
FOR PUBLIC COMMENT

Preliminary Findings Regarding an Operation Permit
for **Primex Plastics Corporation**
in **Wayne County**

MSOP 177-12874, Plt ID 177-00065

Notice is hereby given that the company mentioned above, located at 1235 North F Street, Richmond, Indiana, has made application to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for the renewal of a Minor Source Operating Permit to operate a plastic sheet production facility. Based on 8,760 hours of operation per year, the potential to emit of PM and PM-10 is 58.98 tons per year.

Notice is hereby given that there will be a period of thirty (30) days from the date of publication of this notice during which any interested person may comment on why this proposed permit should or should not be issued. Appropriate comments should be related to air quality issues, interpretation of the applicable state and federal rules, calculations made, technical issues, or the effect that the operation of this facility would have on any aggrieved individuals. IDEM, OAQ does not have jurisdiction in specifying and implementing requirements for zoning, odor or noise. For such issues, please contact your local officials. A copy of the application and staff review is available for examination at **the Morrisson-Reeves (Richmond) Public Library, 80 North Sixth Street, Richmond, Indiana**. A copy of the draft permit is also available for examination at www.state.in.us/idem/OAM/index.html. All comments, along with supporting documentation, should be submitted in writing to the IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana 46206-6015. If appropriate adverse comments concerning the **air pollution impact** of this proposed source are received, together with a request for a public hearing, such a hearing may be held to give further consideration to this application.

Persons not wishing to comment at this time, but wishing to receive notice of future proceedings conducted related to this action, must submit a written request to the Office of Air Quality (OAQ), at the above address. All interested parties of record will receive a notice of the decision on this matter and will then have 15 days after receipt of the Notice of Decision to file a petition for administrative review. Procedures for filing such a petition will be enclosed with the Notice.

Questions should be directed to Linda Quigley, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (973) 575-2555, ext. 3284 or dial (800) 451-6027, press 0 and ask for 3-6878.

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

LQ/EVP

MINOR SOURCE OPERATING PERMIT
Office of Air Quality

Primex Plastics Corporation
1235 North F Street
Richmond, Indiana 47374

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 177-12874-00065	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: April 3, 2003 Expiration Date: April 3, 2008

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary plastic sheet production facility which consists of five (5) plants.

Authorized Individual:	Director Engineering
Source Address:	1235 North F Street, Richmond, Indiana 47374
Mailing Address:	1235 North F Street, Richmond, Indiana 47374
General Source Phone:	(765) 966-7774
SIC Code:	3086
County Location:	Wayne
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules;

A.2 Emissions units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

Plant 1 Equipment:

(a) four (4) polystyrene storage silos, each with a capacity of 160,000 lbs, controlled by dry filters, exhausting through bin vent directly to atmosphere;

(b) six (6) polystyrene storage silos, each with a capacity of 80,000 lbs, controlled by dry filters, exhausting through bin vent directly to the atmosphere;

(c) eight (8) plastic extruders, designated Nos. 1, 2, 3, 4, 6, 7, 10, and 11, each with a maximum throughput of 750 lbs/hr of polystyrene, exhausting to the building's general ventilation system;

(d) one (1) plastic extruder, designated No. 5, with a maximum throughput of 1400 lbs/hr of polystyrene, exhausting to the building's general ventilation system;

(e) one (1) plastic extruder, designated No. 9, with a maximum throughput of 500 lbs/hr of polystyrene, exhausting to the building's general ventilation system;

(f) eight (8) grinders, designated Nos. 1, 2, 3, 4, 7, 8, 10, and 11 each with a maximum throughput of 300 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(g) two (2) grinders, designated Nos. 5, and 6, each with a maximum throughput of 280 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(h) one (1) grinder, designated No. 9, with a maximum throughput of 200 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(i) one (1) pelletizer, with a maximum throughput of 350 lbs/hr of plastic rework, exhausting to the buildings general ventilation system;

(j) two (2) corona treaters, with a maximum usage rate of 5 KW/hr, exhausting to the building's general ventilation system; and

(i) ancillary equipment including eight (8) polystyrene day bins and ten (10) hoppers.

Plant 2 Equipment:

(a) two (2) acrylonitrile butadiene styrene (ABS) storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(b) five (5) polyethylene (HDPE or HMWPE) storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(c) three (3) plastic extruders, designated Nos. 1, 2, and 3, each with a maximum throughput of 800 lbs/hr of ABS, exhausting to the building's general ventilation system;

(d) two (2) plastic extruders, designated Nos. 4 and 9, each with a maximum throughput of 900 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;

(e) four (4) plastic extruders, designated Nos. 5 through 8, each with a maximum throughput of 1200 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;

(f) three (3) grinders, designated Nos. 4, 5 and 6, each with a maximum throughput of 320 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(g) four (4) grinders, designated Nos. 8, 9, 10 and 11, each with a maximum throughput of 480 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(h) two (2) grinders, designated Nos. 7 and 12, each with a maximum throughput of 360 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(i) one (1) corona treater, with a maximum usage of 5 KW/hr, exhausting to the building's general ventilation system; and

(j) ancillary equipment including ten (10) day bins.

Plant 3 and 4 Equipment:

(a) five (5) polyester storage silos, each with a capacity of 160,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(b) one (1) polyester storage silo, with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(c) two (2) polyethylene (HDPE or HMWPE) storage silos, each with a capacity of 80,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(d) one (1) plastic extruder, designated No. 1, with a maximum throughput of 600 lbs/hr of polypropylene, exhausting to the building's general ventilation system;

(e) two (2) plastic extruders, designated Nos. 2 and 3, each with a maximum throughput of 775 lbs/hr of polyester, exhausting to the building's general ventilation system;

(f) one (1) plastic extruder, designated No. 4, with a maximum throughput of 650 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;

(g) one (1) plastic extruder, designated No. 5, with a maximum throughput of 850 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;

(h) one (1) plastic extruder, designated Mega Extruder, with a maximum throughput of 4000 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;

(i) one (1) grinder, designated P1, with a maximum throughput of 240 lbs/hr of plastic rework, exhausting to the buildings general ventilation system;

(j) one (1) grinder, designated P2, with a maximum throughput of 620 lbs/hr of plastic rework, exhausting to the buildings general ventilation system;

(k) one (1) grinder, designated P3, with a maximum throughput of 260 lbs/hr of plastic rework, exhausting to the buildings general ventilation system;

(l) one (1) grinder, designated P4, with a maximum throughput of 340 lbs/hr of plastic rework, exhausting to the buildings general ventilation system;

(m) one (1) grinder, designated P5, with a maximum throughput of 1600 lbs/hr of plastic rework, exhausting to the buildings general ventilation system;

(n) one (1) corona treater, with a maximum usage of 5 KW/hr, exhausting to the building's general ventilation system; and

(o) ancillary equipment including four (4) day bins.

Plant 5 Equipment:

(a) two (2) polypropylene storage silos, each with a capacity of 20,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(b) two (2) polypropylene storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(c) two (2) polyethylene storage silos (HDPE or HMWPE), each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(d) seven (7) plastic extruders, designated Nos. 1, 2, 3, 4, 5, 6 and 7, each with a maximum throughput of 250 lbs/hr of HDPE, HMWPE or polypropylene, exhausting to the building's general ventilation system;

(e) one (1) pelletizer, with a maximum throughput of 370 lbs/hr of plastic rework, exhausting to the buildings general ventilation system.

(f) five (5) grinders, designated Nos. 1, 2, 3, 4, and 5, each with a maximum throughput of 140 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(g) six (6) corona treaters, each with a maximum usage of 5 KW/hr, exhausting to the building's general ventilation system; and

(h) ancillary equipment including four(4) day bins and seven (7) hoppers.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of operating permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Data Section, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

B.9 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of PM is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.

C.3 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM the fact that continuance of this permit is not consistent with purposes of this article.

C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

C.5 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual test date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

Record Keeping and Reporting Requirements

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required data**,** reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.13 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(b) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) All instances of deviations must be clearly identified in such reports. A reportable deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) A malfunction as described in 326 IAC 1-6-2; or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred or failure to monitor or record the required compliance monitoring is a deviation.

(d) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description
(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Plant 1 Equipment:

(a) four (4) polystyrene storage silos, each with a capacity of 160,000 lbs, controlled by dry filters, exhausting through bin vent directly to atmosphere;
(b) six (6) polystyrene storage silos, each with a capacity of 80,000 lbs, controlled by dry filters, exhausting through bin vent directly to the atmosphere;
(c) eight (8) plastic extruders, designated Nos. 1, 2, 3, 4, 6, 7, 10, and 11, each with a maximum throughput of 750 lbs/hr of polystyrene, exhausting to the building's general ventilation system;
(d) one (1) plastic extruder, designated No. 5, with a maximum throughput of 1400 lbs/hr of polystyrene, exhausting to the building's general ventilation system;
(e) one (1) plastic extruder, designated No. 9, with a maximum throughput of 500 lbs/hr of polystyrene, exhausting to the building's general ventilation system;
(f) eight (8) grinders, designated Nos. 1, 2, 3, 4, 7, 8, 10, and 11 each with a maximum throughput of 300 lbs/hr of plastic rework, exhausting to the building's general ventilation system;
(g) two (2) grinders, designated Nos. 5, and 6, each with a maximum throughput of 280 lbs/hr of plastic rework, exhausting to the building's general ventilation system;
(h) one (1) grinder, designated No. 9, with a maximum throughput of 200 lbs/hr of plastic rework, exhausting to the building's general ventilation system;
(i) one (1) pelletizer, with a maximum throughput of 350 lbs/hr of plastic rework, exhausting to the building's general ventilation system;
(j) two (2) corona treaters, with a maximum usage rate of 5 KW/hr, exhausting to the building's general ventilation system; and
(k) ancillary equipment including eight (8) polystyrene day bins and ten (10) hoppers.

Plant 2 Equipment:

(a) two (2) acrylonitrile butadiene styrene (ABS) storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;
(b) five (5) polyethylene (HDPE or HMWPE) storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;
(c) three (3) plastic extruders, designated Nos. 1, 2, and 3, each with a maximum throughput of 800 lbs/hr of ABS, exhausting to the building's general ventilation system;
(d) two (2) plastic extruders, designated Nos. 4 and 9, each with a maximum throughput of 900 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;
(e) four (4) plastic extruders, designated Nos. 5 through 8, each with a maximum throughput of 1200 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;
(f) three (3) grinders, designated Nos. 4, 5 and 6, each with a maximum throughput of 320 lbs/hr of plastic rework, exhausting to the building's general ventilation system;
(g) four (4) grinders, designated Nos. 8, 9, 10 and 11, each with a maximum throughput of 480 lbs/hr of plastic rework, exhausting to the building's general ventilation system;
(h) two (2) grinders, designated Nos. 7 and 12, each with a maximum throughput of 360 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(i) one (1) corona treater, with a maximum usage of 5 KW/hr, exhausting to the building's general ventilation system; and
(j) ancillary equipment including ten (10) day bins.

Plant 3 and 4 Equipment:

(a) five (5) polyester storage silos, each with a capacity of 160,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;
(b) one (1) polyester storage silo, with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;
(c) two (2) polyethylene (HDPE or HMWPE) storage silos, each with a capacity of 80,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;
(d) one (1) plastic extruder, designated No. 1, with a maximum throughput of 600 lbs/hr of polypropylene, exhausting to the building's general ventilation system;
(e) two (2) plastic extruders, designated Nos. 2 and 3, each with a maximum throughput of 775 lbs/hr of polyester, exhausting to the building's general ventilation system;
(f) one (1) plastic extruder, designated No. 4, with a maximum throughput of 650 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;
(g) one (1) plastic extruder, designated No. 5, with a maximum throughput of 850 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;
(h) one plastic extruder, designated Mega Extruder, with a maximum throughput of 4000 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;
(i) one (1) grinder, designated P1, with a maximum throughput of 240 lbs/hr of plastic rework, exhausting to the building's general ventilation system;
(j) one (1) grinder, designated P2, with a maximum throughput of 620 lbs/hr of plastic rework, exhausting to the building's general ventilation system;
(k) one (1) grinder, designated P3, with a maximum throughput of 260 lbs/hr of plastic rework, exhausting to the building's general ventilation system;
(l) one (1) grinder, designated P4, with a maximum throughput of 340 lbs/hr of plastic rework, exhausting to the building's general ventilation system;
(m) one (1) grinder, designated P5, with a maximum throughput of 1600 lbs/hr of plastic rework, exhausting to the building's general ventilation system;
(n) one (1) corona treater, with a maximum usage of 5 KW/hr, exhausting to the building's general ventilation system; and
(o) ancillary equipment including four (4) day bins.

Plant 5 Equipment:

(a) two (2) polypropylene storage silos, each with a capacity of 20,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;
(b) two (2) polypropylene storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;
(c) two (2) polyethylene (HDPE or HMWPE) storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;
(d) seven (7) plastic extruders, designated Nos. 1, 2, 3, 4, 5, 6 and 7, each with a maximum throughput of 250 lbs/hr of HDPE, HMWPE or polypropylene, exhausting to the building's general ventilation system;
(e) one (1) pelletizer, with a maximum throughput of 370 lbs/hr of plastic rework, exhausting to the buildings general ventilation system.
(f) five (5) grinders, designated Nos. 1, 2, 3, 4 and 5, each with a maximum throughput of 140 lbs/hr of plastic rework, exhausting to the building's general ventilation system;
(g) six (6) corona treaters, each with a maximum usage of 5 KW/hr, exhausting to the building's general ventilation system; and
(h) ancillary equipment including four(4) day bins and seven (7) hoppers.

Emission Limitations and Standards

D.1.1 Particulate [326 IAC 6-3-2(c)]

The Particulate from the extruding and grinding facilities shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Equipment Name	Maximum Process Weight Rate (lbs/hr)	Allowable Emission Limit (lbs/hr)	PSD Minor PM Emission Limit (lbs/hr)
Plant 1			
Extruder 1	750	2.13	1.09
Extruder 2	750	2.13	1.09
Extruder 3	750	2.13	1.09
Extruder 4	750	2.13	1.09
Extruder 5	1400	3.23	1.65
Extruder 6	750	2.13	1.09
Extruder 7	750	2.13	1.09
Extruder 9	500	1.62	0.83
Extruder 10	750	2.13	1.09
Extruder 11	750	2.13	1.09
Pelletizer	350	1.28	0.65
Grinder 1	300	1.15	0.59
Grinder 2	300	1.15	0.59
Grinder 3	300	1.15	0.59
Grinder 4	300	1.15	0.59
Grinder 5	280	1.10	0.56
Grinder 6	280	1.10	0.56
Grinder 7	300	1.15	0.59
Grinder 8	300	1.15	0.59
Grinder 9	200	0.88	0.45

Grinder 10	300	1.15	0.59
Grinder 11	300	1.15	0.59
Plant 2			
Extruder 1	800	2.22	1.13
Extruder 2	800	2.22	1.13
Extruder 3	800	2.22	1.13
Extruder 4	900	2.40	1.22
Extruder 5	1200	2.91	1.48
Extruder 6	1200	2.91	1.48
Extruder 7	1200	2.91	1.48
Extruder 8	1200	2.91	1.48
Extruder 9	900	2.40	1.22
Grinder 4	320	1.20	0.61
Grinder 5	320	1.20	0.61
Grinder 6	320	1.20	0.61
Grinder 7	360	1.30	0.66
Grinder 8	480	1.58	0.81
Grinder 9	480	1.58	0.81
Grinder 10	480	1.58	0.81
Grinder 11	480	1.58	0.81
Grinder 12	360	1.30	0.66
Plants 3 and 4			
Extruder 1	600	1.83	0.93
Extruder 2	775	2.17	1.11
Extruder 3	775	2.17	1.11
Extruder 4	650	1.93	0.98
Extruder 5	850	2.31	1.18
Mega Extruder	4000	6.52	3.33
Grinder P1	240	0.99	0.50

Grinder P2	620	1.87	0.95
Grinder P3	260	1.05	0.54
Grinder P4	340	1.25	0.64
Grinder P5	1600	3.53	1.80
Plant 5			
Extruder 1	250	1.02	0.52
Extruder 2	250	1.02	0.52
Extruder 3	250	1.02	0.52
Extruder 4	250	1.02	0.52
Extruder 5	250	1.02	0.52
Extruder 6	250	1.02	0.52
Extruder 7	250	1.02	0.52
Pelletizer	370	1.32	0.67
Grinder 1	140	0.69	0.35
Grinder 2	140	0.69	0.35
Grinder 3	140	0.69	0.35
Grinder 4	140	0.69	0.35
Grinder 5	140	0.69	0.35

D.1.2 PSD Limit [326 IAC 2-2] [40 CFR 52.21]

PM emissions from all extruders, pelletizers and grinders in Plants 1, 2, 3, 4 and 5, shall be limited to the PSD minor emission limits specified in the above table. Compliance with these limits shall render the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.1.3 Particulate Control

The dry filters on the silos and the blowers (storage and handling system), considered as an integral part of the processes, shall be in operation at all times.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6:

One (1) cold cleaner operation, using petroleum distillates, for routine maintenance activities.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Volatile Organic Compounds (VOC)

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

D.2.2 Volatile Organic Compounds (VOC)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser emissions unit shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning emissions unit shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description

Production of wood shipping pallets at two locations in the facility, operating two saws controlled by dust collectors.

Two uncontrolled band saws are used to cut plastic scrap product and customer return to size for grinders.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.3.1 Particulate [326 IAC 6-3-2(c)]

The Particulate from the wood and plastic sawing operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Process	Allowable Emission Limit (lbs/hr)
Wood Pallet Construction	0.88
Scrap Plastic Cutting	0.88

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Primex Plastics Corporation**
Address:	**1235 North F Street**
City:	**Richmond, IN 47374**
Phone #:	**(765) 966-7774**
MSOP #:	**177-12874-00065**

I hereby certify that Primex Plastics Corporation is
9 still in operation.
9 no longer in operation.

I hereby certify that Primex Plastics Corporation is
9 in compliance with the requirements of MSOP 177-12874-00065.
9 not in compliance with the requirements of MSOP 177-12874-00065.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY: Primex Plastics Corporation PHONE NO. (765) 966-7774
LOCATION: Richmond, Wayne County
PERMIT NO. 177-12874-00065 AFS PLANT ID: 177-00065 AFS POINT ID: _____ INSP: Warren Greiling
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 19____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Minor Source Operating Permit (MSOP)

Source Name:	Primex Plastics Corporation
Source Location:	1235 North F Street, Richmond, Indiana 47374
County:	Wayne
Construction Permit No.:	MSOP 177-12874-00065
SIC Code:	3086
Permit Reviewer:	Linda Quigley/EVP

On April 20, 2001, the Office of Air Quality (OAQ) had a notice published in the Palladium Item, Richmond, Indiana, stating that Primex Plastics Corporation had applied for a Minor Source Operating Permit renewal to operate a plastic sheet production facility. The notice also stated that OAQ proposed to issue a permit for this installation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 21, 2001 Primex Plastics Corporation submitted comments on the proposed operating permit. The summary of the comments and corresponding responses is as follows:

Comment #1

Section A.1 of the proposed permit states the county status is a Non-attainment area for SO2, but this is not correct. Wayne County's status is listed by IDEM as "Maintenance - Attainment" for SO2. The draft permit Technical Support Document (TSD) also states that Wayne County is classified as attainment for SO2. The permit should be corrected to state the county status as attainment for SO2.

Response #1

Section A.1 will be revised as follows:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary plastic sheet production facility which consists of five (5) plants.

Authorized Individual:	Leon Gohn
Source Address:	1235 North F Street, Richmond, Indiana 47374
Mailing Address:	1235 North F Street, Richmond, Indiana 47374
SIC Code:	3086
County Location:	Wayne
County Status:	~~Non-attainment area for SO_2~~ Attainment ~~area~~ for all ~~other~~ criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD or Emission Offset Rules;

Comment #2

In the Section D.1 Emissions Unit Description, Items (b) and (c) of the Plant 2 Equipment description are not correctly stated. The description is correct in Section A, and in Section D.1 Item (b) of the Plant 2 Equipment should be corrected to "five (5) ~~three (3)~~ polyethylene (HDPE or HMWPE) storage silos," Item (c) should be deleted, and the remaining items should be re-lettered.

Response #2

Section D.1 Emissions Unit Description (Plant 2 Equipment) has been revised as follows:

Plant 2 Equipment:

(a) two (2) acrylonitrile butadiene styrene (ABS) storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(b) ~~three (3)~~ **five (5)** polyethylene (HDPE or HMWPE) storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

~~(c) two (2) polyethylene (HDPE or HMWPE) storage silos, each with a capacity of 160,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;~~

~~(d)~~ **(c)** three (3) plastic extruders, designated Nos. 1, 2, and 3, each with a maximum throughput of 800 lbs/hr of ABS, exhausting to the building's general ventilation system;

~~(e)~~ **(d)** two (2) plastic extruders, designated Nos. 4 and 9, each with a maximum throughput of 900 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;

~~(f)~~ **(e)** four (4) plastic extruders, designated Nos. 5 through 8, each with a maximum throughput of 1200 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;

~~(g)~~ **(f)** three (3) grinders, designated Nos. 4, 5 and 6, each with a maximum throughput of 320 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

~~(h)~~ **(g)** four (4) grinders, designated Nos. 8, 9, 10 and 11, each with a maximum throughput of 480 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

~~(i)~~ **(h)** two (2) grinders, designated Nos. 7 and 12, each with a maximum throughput of 360 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

~~(j)~~ **(i)** one (1) corona treater, with a maximum usage of 5 KW/hr, exhausting to the building's general ventilation system; and

~~(k)~~ **(j)** ancillary equipment including ten (10) day bins.

This change has also been made in Section A of the permit.

Comment #3

Also in the Section D.1 Emissions Unit Description, to be accurate and consistent please add "or HMWPE" to Item (c) of the Plant 3 and 4 Equipment description and "(HDPE or HMWPE)" to Item (c) of the Plant 5 Equipment description so that they both read "polyethylene (HDPE or HMWPE) storage silos."

Response #3

Section D.1 Emissions Unit Description (Plants 3, 4 and 5 Equipment) has been revised as follows:

Plant 3 and 4 Equipment:
(a) five (5) polyester storage silos, each with a capacity of 160,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;
(b) one (1) polyester storage silo, with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;
(c) two (2) polyethylene (HDPE **or HMWPE**) storage silos, each with a capacity of 80,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

Plant 5 Equipment:
(a) two (2) polypropylene storage silos, each with a capacity of 20,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;
(b) two (2) polypropylene storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;
(c) two (2) polyethylene **(HDPE or HMWPE)** storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

This change has also been made in Section A of the permit.

Comment #4

Condition D.1.2 and the corresponding last column of the table in Condition D.1.1 are not necessary and should be deleted. The maximum PM emissions of this source are below 100 tons per year, which is why a Minor Source Operating Permit is indicated. It is not physically possible for the source to emit PM at levels that would make the PSD rules applicable, so it is not necessary to place a limit on the source for this purpose. There is no explanation in the permit TSD of why this condition or the additional limits have been stated. In fact the TSD states:

> "This existing source is not a major stationary source [for PSD] because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories."

With no explanation of why this condition or the additional limits have been included, we can only state what is known, that this source's maximum, unrestricted potential to emit PM is less than 100 tons per year so no further limit is necessary.

Response #4

The allowable emission rate specified in 326 IAC 6-3-2 would be greater than the PSD applicability threshold of 250 tons per year of PM if that rate was used to determine potential emissions. Even though the source has the potential to emit PM of 59 tons per year, the annual allowable emission rate must be limited in order to render the requirements of 326 IAC 2-2 and 40 CFR 52.21 not applicable.

Comment #5

Condition D.3.1 refers to PM from the extruding and grinding facilities and should be changed to read: "The PM from the wood and plastic sawing operations."

Response #5

Condition D.3.1 has been revised as follows:

The PM from the ~~extruding and grinding facilities~~ **wood and plastic sawing operations** shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Process	Allowable Emission Limit (lbs/hr)
Wood Pallet Construction	0.88
Scrap Plastic Cutting	0.88

Additionally, emission calculations have been updated to correctly reference the source of emission factors and correct the HAPs emissions methodology. These changes do not effect any potential and controlled emissions except for HAPs. Total potential HAPs emissions have reduced from 8.04 to 6.76 tons per year based on new methodology. Revised emission calculations spreadsheets (Pages 1 through 8, TSD Addendum App A) are attached.

Upon further review, the OAQ has decided to make the following changes to the MSOP. Bolded language has been added and the language with a line through it has been deleted.

1. Section A.1
The title of the authorized individual is now preferred so that there are less changes needed to be made. A general number has replace the contact person's phone number. "County Status" has been replaced with "Source Location Status" in order to clarify when only portions of a county are non-attainment.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary plastic sheet production facility which consists of five (5) plants.

Authorized Individual:	~~Leon Gohn~~ **Director Engineering**
Source Address:	1235 North F Street, Richmond, Indiana 47374
Mailing Address:	1235 North F Street, Richmond, Indiana 47374
General Source Phone:	**(765) 966-7774**
SIC Code:	3086
County Location:	Wayne
~~County Status:~~	~~Non-attainment area for SO_2~~
Source Location Status:	Attainment ~~area~~ for all ~~other~~ criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD ~~or Emission Offset~~ Rules;

2. B.2 (Definitions) has been revised to clarify the language.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, ~~any~~ **the** applicable definitions found in **the statutes or regulations** IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

3. Condition B.5 (Permit Term and Renewal) has been added to the permit.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

4. Annual Notification has been moved to Section B.6 from Section C.16.

5. Preventive Maintenance Plan has been moved to Section B.7 from Section C.2. The language "Preventive Maintenance Plans" has been replaced with "PMPs" throughout the condition, since it has already been defined. In (c) language was added that says the source has a reasonable time to provide a PMP when IDEM, OAQ requests it.

~~C.2~~**B.7** Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP**s**) **within ninety (90) days** after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; **and**

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the ~~Preventive Maintenance Plans~~ **PMPs** as necessary to ensure that failure to implement ~~the Preventive Maintenance Plan~~ **a PMP** does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) **A copy of the** PMPs shall be submitted to IDEM, OAQ upon request **and within a reasonable time,** and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ may require the Permittee to revise its ~~Preventive Maintenance Plan~~ **PMPs** whenever lack of proper maintenance causes or contributes to any violation. **The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).**

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

6. Permit Revision has been moved to Section B.8 from Section C.3. (a) has been revised to prevent liability to both a permit violation and a rule violation. By changing this language IDEM is merely referencing the requirements and not mandating compliance with it. It has been changed to replace "should" with "shall" in subpart (b). "the" authorized individual has been replaced with "an" authorized individual, because the rule does not specify that it has to be one individual; this change will be made throughout the permit.

~~C.3~~**B.8** Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) ~~The Permittee must comply with~~ **Permit revisions are governed by** the requirements of 326 IAC 2-6.1-6 ~~whenever the Permittee seeks to amend or modify this permit~~.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application ~~should~~ **shall** be certified by ~~the~~ **an** "authorized individual" as defined by 326 IAC 2-1.1-1.

7. Inspection and Entry and Transfer of Ownership have both been moved to Sections B.9 and B.10, respectively, from Sections C.4 and C.5, respectively.

8. B.11 Annual Fee Payment was added to the permit.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

Section C

9. C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour has been added to the MSOP. All other C conditions have been re-numbered accordingly.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

10. C.6 Permit Revocation has been re-numbered as C.3 and the rule cite was corrected.

C.~~6~~**3** Permit Revocation ~~[326 IAC 2-1-9]~~ **[326 IAC 2-1.1-9]**

11. Asbestos Abatement Projects has been added to the MSOP.

C.4 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

12. The statement that "326 IAC 6-4-2(4) is not federally enforceable" has been removed from Condition C.8 (renumbered to C.6).

C.~~8~~**6** Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

13. C.9 (Performance Testing) has been re-numbered as C.7 and rearranged for clarity. Language has also been added to indicate that the test protocol and the notification of the test date do not require certification by the authorized individual. Part (c) "within" has been changed to "not later than".

C.~~9~~**7** Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved

by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. ~~The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual test date.

~~(b)~~**(c) Pursuant to 326 IAC 3-6-4(b), all** ~~All~~ test reports must be received by IDEM, OAQ ~~within~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation ~~within~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

~~The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.~~

14. C.8 Compliance Requirements is a new condition that refers to IDEM's general compliance authority in 326 IAC 2-1.1-11.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

15. C.10. Compliance Monitoring has been re-numbered as C.9.

C.~~10~~**9** Compliance Monitoring [326 IAC 2-1.1-11]

16. C.11 Monitoring Methods has been re-numbered as C.10 and the following rule cites have been added.

C.~~11~~**10** Monitoring Methods [326 IAC 3] **[40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60, Appendix B, 40 CFR 63**, or other approved methods as specified in this permit.

17. C.13 Monitoring Data Availability is not applicable and has been deleted.

~~C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]~~

~~(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~

~~(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~

~~(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~

~~(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~

~~(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~

~~(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~

18. (General Record Keeping Requirements) has been revised to be more consistent with the rules and to assure sources that they get a “reasonable time” to produce records no matter how or when IDEM ask for them. “monitoring” was removed so that the condition will seem more generalized to all record keeping, “reports” was added to clarify that the source must keep copies of those as well. (b) and (c) have been removed because they were unnecessary.

C.1~~4~~**2** General Record Keeping Requirements [326 IAC 2-6.1-~~2~~ **5**]

(a) Records of all required ~~monitoring~~ data**, reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years ~~and available upon the request of an IDEM, OAQ representative~~. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a ~~written~~ request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

~~(b) Records of required monitoring information shall include, where applicable:~~

~~(1) The date, place, and time of sampling or measurements;~~

~~(2) The dates analyses were performed;~~

~~(3) The company or entity performing the analyses;~~

~~(4) The analytic techniques or methods used;~~

~~(5) The results of such analyses; and~~

~~(6) The operating conditions existing at the time of sampling or measurement.~~

~~(c) Support information shall include, where applicable:~~

~~(1) Copies of all reports required by this permit;~~

~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~

~~(3) All calibration and maintenance records;~~

~~(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

~~(d)~~**(b) Unless otherwise specified in this permit, a**~~A~~ll record keeping requirements not already legally required shall be implemented when operation begins.

Section D

19. Previously, the terms "particulate" and "particulate matter" were both used in the 326 IAC 6-3, but revisions were made to the rule which became effective on June 12, 2002 that included using the term "particulate" consistently in 326 IAC 6-3. Conditions D.1.1, D.1.3 and D.3.1 have been revised accordingly.

D.1.1 Particulate ~~Matter (PM)~~ [326 IAC 6-3-2(c)]

The ~~PM~~ **Particulate** from the extruding and grinding facilities shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

D.1.3 Particulate ~~Matter (PM)~~ **Control**

The dry filters on the silos and the blowers (storage and handling system), considered as an integral part of the processes, shall be in operation at all times.

D.3.1 Particulate ~~Matter (PM)~~ [326 IAC 6-3-2(c)]

The ~~PM~~ **Particulate** from the wood and plastic sawing operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name: **Primex Plastics Corporation**
Source Location: **1235 North F Street, Richmond, Indiana 47374**
County: **Wayne**
SIC Code: **3086**
Operation Permit No.: **177-12874-00065**
Permit Reviewer: **Linda Quigley/EVP**

The Office of Air Quality (OAQ) has reviewed an application from Primex Plastics Corporation relating to the conversion to a Minor Source Operating Permit for the plastic sheet production facility and to incorporate facility changes.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Note: The following emission units were constructed in 1997 and 1998 with the exception of what is noted under Plants 3, 4 and 5. These changes all proved to be exempt from permitting.

Plant 1 Equipment:

(a) four (4) polystyrene storage silos, each with a capacity of 80,000 lbs, controlled by dry filters, exhausting through bin vent directly to atmosphere;

(b) two (2) plastic extruders, designated Nos. 10 and 11, each with a maximum throughput of 750 lbs/hr of polystyrene, exhausting to the building's general ventilation system; and

(c) one (1) grinder, designated No. 11, with a maximum throughput of 300 lbs/hr of plastic rework, exhausting to the building's general ventilation system.

Plant 2 Equipment:

(a) two (2) polyethylene (HDPE or HMWPE) storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(b) one (1) grinder, designated No. 11, with a maximum throughput of 480 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(c) one (1) grinder, designated No. 12, with a maximum throughput of 360 lbs/hr of plastic rework, exhausting to the building's general ventilation system; and

(d) ancillary equipment including three (3) day bins.

Plant 3 and 4 Equipment:

(a) two (2) polyethylene (HDPE) storage silos, each with a capacity of 80,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(b) three (3) polyester storage silos, each with a capacity of 160,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(c) one (1) grinder, designated No. P5, with a maximum throughput of 1600 lbs/hr plastic rework, exhausting to the building's general ventilation system; and

(d) ancillary equipment including two (2) day bins.

Notes: Three (3) polyester storage silos with a capacity of 160,000 lbs each were not included in CP177-6705-00065. The silos are listed in item (b) above. This correction does not influence the level of permitting, nor has it violated any previous permit.

Plant 5 Equipment:

(a) one (1) grinder, designated No. 5, with a maximum throughput of 140 lbs/hr of plastic rework, exhausting to the building's general ventilation system; and

(b) one (1) pelletizer, with a maximum throughput of 370 lbs/hr of plastic rework, exhausting to the buildings general ventilation system.

Notes: one (1) pelletizer, item (b) above, was not included in CP177-6705-00065. This correction does not influence the level of permitting, nor has it violated any previous permit.

Note: The following emission units were previously permitted in CP117-6705-00065.

Plant 1 Equipment:

(a) four (4) polystyrene storage silos, each with a capacity of 160,000 lbs, controlled by dry filters, exhausting through bin vent directly to atmosphere;

(b) two (2) polystyrene storage silos, each with a capacity of 80,000 lbs, controlled by dry filters, exhausting through bin vent directly to the atmosphere;

(c) six (6) plastic extruders, designated Nos. 1, 2, 3, 4, 6, 7, each with a maximum throughput of 750 lbs/hr of polystyrene, exhausting to the building's general ventilation system;

(d) one (1) plastic extruder, designated No. 5, with a maximum throughput of 1400 lbs/hr of polystyrene, exhausting to the building's general ventilation system;

(e) one (1) plastic extruder, designated No. 9, with a maximum throughput of 500 lbs/hr of polystyrene, exhausting to the building's general ventilation system;

(f) seven (7) grinders, designated Nos. 1 through 4, 7, 8 and 10, each with a maximum throughput of 300 lbs/hr of plastic rework, exhausting to the building's

general ventilation system;

(g) two (2) grinders, designated Nos. 5 and 6, each with a maximum throughput of 280 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(h) one (1) grinder, designated No. 9, with a maximum throughput of 200 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(i) one (1) pelletizer, with a maximum throughput of 350 lbs/hr of plastic rework, exhausting to the buildings general ventilation system;

(j) two (2) corona treaters, with a maximum usage rate of 5 KW/hr, exhausting to the building's general ventilation system; and

(k) ancillary equipment including eight (8) polystyrene day bins and ten (10) hoppers.

Notes: Plastic extruder No. 8 was removed.

Plant 2 Equipment:

(a) two (2) acrylonitrile butadiene styrene (ABS) storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(b) three (3) polyethylene (HDPE or HMWPE) storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(c) three (3) plastic extruders, designated Nos. 1, 2, and 3, each with a maximum throughput of 800 lbs/hr of ABS, exhausting to the building's general ventilation system;

(d) two (2) plastic extruders, designated Nos. 4 and 9, each with a maximum throughput of 900 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;

(e) four (4) plastic extruders, designated Nos. 5 through 8, each with a maximum throughput of 1200 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;

(f) three (3) grinders, designated Nos. 4 through 6, each with a maximum throughput of 320 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(g) three (3) grinders, designated Nos. 8 through 10 each with a maximum throughput of 480 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(h) one (1) grinder, designated No. 7, with a maximum throughput of 360 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(i) one (1) corona treater, with a maximum usage of 5 KW/hr, exhausting to the building's general ventilation system; and

(j) ancillary equipment including seven (7) day bins.

Notes: Three (3) polyethylene (HDPE or HMWPE) storage silos, each with a capacity of 160,000 lbs, have been removed;

Extruder No. 3 changed from HDPE or HMWPE to ABS, and the maximum throughput changed from 900 to 800 lbs/hr (item (c) above);

The maximum throughput of extruder No. 9 was designated incorrectly in CP 177-6705-00065 as 1200 lbs/hr, it is correctly reflected in item (d) above; and

Extruders designated as "corner protector" and "roll ends" have been removed.

Plant 3 and 4 Equipment:

(a) two (2) polyester storage silos, each with a capacity of 160,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(b) one (1) polyester storage silo, with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(c) one (1) plastic extruder, designated No. 1, with a maximum throughput of 600 lbs/hr of polypropylene, exhausting to the building's general ventilation system;

(d) two (2) plastic extruders, designated Nos. 2 and 3, each with a maximum throughput of 775 lbs/hr of polyester, exhausting to the building's general ventilation system;

(e) one (1) plastic extruder, designated No. 4, with a maximum throughput of 650 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;

(f) one (1) plastic extruder, designated No. 5, with a maximum throughput of 850 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;

(g) one plastic extruder, designated Mega Extruder, with a maximum throughput of 4000 lbs/hr of HDPE or HMWPE, exhausting to the building's general ventilation system;

(h) one (1) grinder, designated P1, with a maximum throughput of 240 lbs/hr of plastic rework, exhausting to the buildings general ventilation system;

(i) one (1) grinder, designated P2, with a maximum throughput of 620 lbs/hr of plastic rework, exhausting to the buildings general ventilation system;

(j) one (1) grinder, designated P3, with a maximum throughput of 260 lbs/hr of plastic rework, exhausting to the buildings general ventilation system;

(k) one (1) grinder, designated P4, with a maximum throughput of 340 lbs/hr of plastic rework, exhausting to the buildings general ventilation system;

(l) one (1) corona treater, with a maximum usage of 5 KW/hr, exhausting to the building's general ventilation system; and

(m) ancillary equipment including two (2) day bins.

Notes: Extruder No. 4 changed from polyester to HDPE or HMWPE;

One (1) grinder, designated Plant 4 Grinder, with a maximum throughput of 2000 lbs/hr has been designated inoperable and is no longer in use; and

Six (6) hoppers have been removed.

Plant 5 Equipment:

(a) two (2) polypropylene storage silos, each with a capacity of 20,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(b) two (2) polypropylene storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(c) two (2) polyethylene storage silos, each with a capacity of 40,000 lbs, controlled by dry filters, exhausting through bin vents directly to the atmosphere;

(d) seven (7) plastic extruders, designated Nos. 1 through 7, each with a maximum throughput of 250 lbs/hr of HDPE, HMWPE or polypropylene, exhausting to the building's general ventilation system;

(e) four (4) grinders, designated Nos. 1 through 4, each with a maximum throughput of 140 lbs/hr of plastic rework, exhausting to the building's general ventilation system;

(f) six (6) corona treaters, each with a maximum usage of 5 KW/hr, exhausting to the building's general ventilation system; and

(g) ancillary equipment including four(4) day bins and seven (7) hoppers.

Primex produces wood shipping pallets at two locations in the facility, operating two saws controlled by dust collectors.

Two uncontrolled band saws are used to cut plastic scrap product and customer return to size for grinders.

Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6:

(1) One (1) cold cleaner operation, using organic solvents, for routine maintenance activities.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP 177-6705-00065, issued on February 17, 1997.

All conditions from previous approvals were incorporated into this permit.

Source Definition

This plastic sheet production company consists of five (5) plants:

(a) Plants 1, 2, 3, 4, and 5 are all located at 1235 North F Street, Richmond, IN 47374.

Since the five (5) plants are located in contiguous properties, have the same SIC codes and are owned by one (1) company, they are considered one (1) source.

Air Pollution Control Justification as an Integral Part of the Process

Primex Plastics Corporation has submitted the following justification such that dry filters on the silos and dry filters on the blowers be considered as an integral part of the process (storage and handling).

(a) The primary purpose for dry filters on the silos is to keep vermin out of the product stored.

(b) The dry filters on the blowers are necessary to remove the dust in the plastic resin stream. The dust must be removed to protect the blowers and downstream operations. If the plastic dust is allowed to settle on the lobe vanes of the blowers, the heat generated by the blowers will melt the plastic and cause the blowers to seize.

IDEM, OAQ has evaluated the justifications and agreed that the dry filters will be considered as an integral part of the storage and handling process. Therefore, the permitting level will be determined using the potential to emit after the dry filters. Operating conditions in the proposed permit will specify that these dry filters shall operate at all times when the silos are in use and when the blowers are in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 18, 2000. Additional information was received on January 15, 2001, February 27, 2001, and March 12, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 - 8).

Pursuant to CP177-6705-00065, the corona treaters, which produce significant amounts of ozone (O_3), will not be included in any emissions calculations because ozone is not a regulated pollutant.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	58.98
PM-10	58.98
SO_2	0.00
VOC	20.74
CO	4.43
NO_x	0.00

HAP's	Potential To Emit (tons/year)
Formaldehyde	3.59E-003
Acrolein	1.20E-003
Acetaldehyde	2.99E-003
Acrylic Acid	1.20E-003
Propionaldehyde	1.20E-003
Methyl Ethyl Ketone	1.20E-003
Acrylonitrile	3.63E-001
Ethyl benzene	3.74E-001
Styrene	5.88E+000
Cumene	1.25E-001
Acetophenone	4.33E-001
Propylene Compounds	8.58E-001
TOTAL	8.04E+000

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM and PM-10 are equal to or greater than 25 tons per year. Therefore, pursuant to 326 IAC 2-5.1-3, Section (a)(1), and 326 IAC 2-6.1-2, a minor source operating permit is required.

Actual Emissions

No previous emission data has been received from the source.

County Attainment Status

The source is located in Wayne County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Wayne County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Wayne County has been classified as attainment for PM_{10}, Ozone, CO, SO_2 and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	58.98
PM10	58.98
SO_2	0.00
VOC	20.74
CO	4.43
NO_x	0.00

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) This existing source is not a major stationary source because no non-attainment regulated pollutant is emitted at a rate of 100 tons per year, and it is not in one of the 28 listed source categories.

(c) These emissions were based on information and calculations supplied by the applicant.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this MSOP 177-12874-00065, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) The National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Halogenated Solvent Cleaning (40 CFR Part 63, Subpart T) is not applicable to this source because a non-chlorinated solvent cold cleaner is used. No other NESHAPs apply to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Wayne County and the potential to emit for each of the regulated pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (New Source Toxics Control)

This rule applies to new or reconstructed facilities with potential emissions of any single HAP equal to or greater than ten (10) tons per year and potential emissions of combination of HAPs greater than or equal to twenty-five (25) tons per year. Since this facility emits less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of combination of HAPs, the requirements of 326 IAC 2-4.1 do not apply.

326 IAC 6-3-2 (Process Operations)

(c) The particulate matter (PM) from the extruding and grinding facilities shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

Each extruder and grinder will have a separate 326 IAC 6-3 particulate matter limit because:

(1) the extruders and grinders work independently of each other;

(2) the extruders are operated in parallel, such that any extruder operates independently of any other extruder; and

(3) the grinders are operated in parallel, such that any grinder operates independently of any other grinder.

See Appendix A, (pages 3 through 6) for process operations calculations.

(b) The particulate matter (PM) from the pallet making and scrap plastic cutting facilities shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

See Appendix A, (page 8) for process operations calculations.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

326 IAC 8-1-6 (BACT) does not apply to the grinders and extruders because the potential to emit VOCs is less than 25 tons per year.

326 IAC 8-3-2 (Cold Cleaner Operations)

The cold cleaner facility is subject to 326 IAC 8-3-2 because it uses organic solvents and was constructed after January 1, 1980. Pursuant to 326 IAC 8-3-2, the owner or operator of a cold cleaning facility performing organic solvent degreasing operations shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a emissions unit for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control)

The cold cleaner facility is subject to 326 IAC 8-3-5 because it uses organic solvents, does not have a remote solvent reservoir and was constructed after July 1, 1990.

(a) Pursuant to 326 IAC 8-3-5(a), the owner or operator of the organic solvent cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) the solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) the solvent is agitated; or

(C) the solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury) or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Conclusion

The operation of this plastic sheet production facility shall be subject to the conditions of the attached proposed Minor Source Operating Permit 177-12874-00065.

Appendix A: Emission Calculations

Company Name: Primex Plastics Corporation
Address City IN Zip: 1235 North F Street, Richmond, Indiana 47374
MSOP: 177-12874-00065
Plt ID: 177-00065
Reviewer: Linda Quigley/EVP
Date: March 28, 2003

Uncontrolled Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Silos Storage and Handling	Plants 1 through 5 Extruder Operations	Plants 1 through 5 Grinder Operations	**TOTAL**
PM	* 2.38	39.87	16.73	58.98
PM10	* 2.38	39.87	16.73	58.98
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	0.00	20.74	0.00	20.74
CO	0.00	4.43	0.00	4.43
total HAPs	0.00	6.76	0.00	6.76
worst case single HAP	0.00	5.88 (Styrene)	0.00	5.88 (Styrene)

Total emissions based on rated capacity at 8,760 hours/year.
*Dry filters on the silos and blowers of the storage and handling operations are considered integral to the process. Therefore, PTE is based on control.

Controlled Potential Emissions (tons/year)

	Emissions Generating Activity			
Pollutant	Silos Storage and Handling	Plants 1 through 5 Extrusion Operations	Plants 1 through 5 Grinding Operations	**TOTAL**
PM	2.38	39.87	16.73	58.98
PM10	2.38	39.87	16.73	58.98
SO2	0.00	0.00	0.00	0.00
NOx	0.00	0.00	0.00	0.00
VOC	0.00	20.74	0.00	20.74
CO	0.00	4.43	0.00	4.43
total HAPs	0.00	6.76	0.00	6.76
worst case single HAP	0.00	5.88 (Styrene)	0.00	5.88 (Styrene)

Total emissions based on rated capacity at 8,760 hours/year, after control.

Appendix A: Emissions Calculations
Particulate
From Storage and Handling Operations

Company Name: Primex Plastics Corporation
Address City IN Zip: 1235 North F Street, Richmond, Indiana 47374
MSOP: 177-12874-00065
Plt ID: 177-00065
Reviewer: Linda Quigley/EVP
Date: March 28, 2003

			Particulate Matter		
Equipment	Resin	Maximum Rate tons/yr	Emission Factor lbs/ton	uncontrolled tons/yr	controlled tons/yr
Storage and Handling					
	HIPS	36000	0.8	14.40	0.72
	ABS	11000	0.8	4.40	0.22
	HDPE	53000	0.8	21.20	1.06
	Polyester	7000	0.8	2.80	0.14
	PP	12000	0.8	4.80	0.24
Potential Emissions				**47.60**	**2.38**

PM emission factor is from AP-42, Table 6.6.2-2 for storage.
Dry filters on the silos and blowers are considered integral to the process. Therefore, PTE of PM for storage and handling is after control.
Control efficiency is 95.0% with dry filters.

Appendix A: Emissions Calculations
VOC, CO and Particulate
From Extruder, Grinder, and Pelletizer Operations

Company Name: Primex Plastics Corporation
Address City IN Zip: 1235 North F Street, Richmond, Indiana 47374
MSOP: 177-12874-00065
Plt ID: 177-00065
Reviewer: Linda Quigley/EVP
Date: March 28, 2003

			Particulate Matter				VOC			CO		
Equipment	Resin	Maximum Rate lbs/hr	Emission Factor lbs/MMlbs	Potential lbs/hr	Potential tons/yr	Allowable lbs/hr	Emission Factor lbs/MMlbs	lbs/hr	tons/yr	Emission Factor lbs/MMlbs	lbs/hr	tons/yr
Plant 1												
Extruder 1	HIPS	750	650	0.49	2.14	2.13	190	0.14	0.62	10	0.01	0.03
Extruder 2	HIPS	750	650	0.49	2.14	2.13	190	0.14	0.62	10	0.01	0.03
Extruder 3	HIPS	750	650	0.49	2.14	2.13	190	0.14	0.62	10	0.01	0.03
Extruder 4	HIPS	750	650	0.49	2.14	2.13	190	0.14	0.62	10	0.01	0.03
Extruder 5	HIPS	1400	650	0.91	3.99	3.23	190	0.27	1.17	10	0.01	0.06
Extruder 6	HIPS	750	650	0.49	2.14	2.13	190	0.14	0.62	10	0.01	0.03
Extruder 7	HIPS	750	650	0.49	2.14	2.13	190	0.14	0.62	10	0.01	0.03
Extruder 9	HIPS	500	650	0.33	1.42	1.62	190	0.10	0.42	10	0.01	0.02
Extruder 10	HIPS	750	650	0.49	2.14	2.13	190	0.14	0.62	10	0.01	0.03
Extruder 11	HIPS	750	650	0.49	2.14	2.13	190	0.14	0.62	10	0.01	0.03
Pelletizer	HIPS	350	650	0.23	1.00	1.28	190	0.07	0.29	10	0.00	0.02
Total P1 Extruders		**8250**		**5.36**	**23.49**	**23.17**		**1.57**	**6.87**		**0.08**	**0.36**
			lbs/ton									
Grinder 1		300	0.35	0.05	0.23	1.15						
Grinder 2		300	0.35	0.05	0.23	1.15						
Grinder 3		300	0.35	0.05	0.23	1.15						
Grinder 4		300	0.35	0.05	0.23	1.15						
Grinder 5		280	0.35	0.05	0.21	1.10						
Grinder 6		280	0.35	0.05	0.21	1.10						
Grinder 7		300	0.35	0.05	0.23	1.15						
Grinder 8		300	0.35	0.05	0.23	1.15						
Grinder 9		200	0.35	0.04	0.15	0.88						
Grinder 10		300	0.35	0.05	0.23	1.15						
Grinder 11		300	0.35	0.05	0.23	1.15						
Total P1 Grinders		**3160**		**0.55**	**2.42**	**12.28**						
State Potential Emissions				**5.92**	**25.92**			**1.57**	**6.87**		**0.08**	**0.36**

Emission Factors for grinding are from FIRE Version 6.22 for log sawing (SCC# 3-07-008-02).
Emission Factors for extrusion were obtained from studies done by the plastics industry and supplied by the applicant.
HIPS Emission factors are obtained from Air & Waste Management Association Paper: "Sampling and Analysis of Volatile Organic Compounds Evolved during Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins", September 1995.

Appendix A: Emissions Calculations
VOC, CO and Particulate
From Extruder and Grinder Operations

Company Name: Primex Plastics Corporation
Address City IN Zip: 1235 North F Street, Richmond, Indiana 47374
MSOP: 177-12874-00065
Plt ID: 177-00065
Reviewer: Linda Quigley/EVP
Date: March 28, 2003

			Particulate Matter				VOC			CO		
Equipment	Resin	Maximum Rate lbs/hr	Emission Factor lbs/MMlbs	Potential lbs/hr	Potential tons/yr	Allowable lbs/hr	Emission Factor lbs/MMlbs	lbs/hr	tons/yr	Emission Factor lbs/MMlbs	lbs/hr	tons/yr
Plant 2												
Extruder 1	ABS	800	650	0.52	2.28	2.22	190	0.15	0.67	0	0.00	0.00
Extruder 2	ABS	800	650	0.52	2.28	2.22	190	0.15	0.67	0	0.00	0.00
Extruder 3	ABS	800	650	0.52	2.28	2.22	190	0.15	0.67	0	0.00	0.00
Extruder 4	HDPE	900	30	0.03	0.12	2.40	35	0.03	0.14	50	0.05	0.20
Extruder 5	HDPE	1200	30	0.04	0.16	2.91	35	0.04	0.18	50	0.06	0.26
Extruder 6	HDPE	1200	30	0.04	0.16	2.91	35	0.04	0.18	50	0.06	0.26
Extruder 7	HDPE	1200	30	0.04	0.16	2.91	35	0.04	0.18	50	0.06	0.26
Extruder 8	HDPE	1200	30	0.04	0.16	2.91	35	0.04	0.18	50	0.06	0.26
Extruder 9	HDPE	900	30	0.03	0.12	2.40	35	0.03	0.14	50	0.05	0.20
Total P2 Extruders		**9000**		**1.76**	**7.70**	**23.10**		**0.69**	**3.01**		**0.33**	**1.45**
			lbs/ton									
Grinder 4		320	0.35	0.06	0.25	1.20						
Grinder 5		320	0.35	0.06	0.25	1.20						
Grinder 6		320	0.35	0.06	0.25	1.20						
Grinder 7		360	0.35	0.06	0.28	1.30						
Grinder 8		480	0.35	0.08	0.37	1.58						
Grinder 9		480	0.35	0.08	0.37	1.58						
Grinder 10		480	0.35	0.08	0.37	1.58						
Grinder 11		480	0.35	0.08	0.37	1.58						
Grinder 12		360	0.35	0.06	0.28	1.30						
Total P2 Grinders		**3600**		**0.63**	**2.76**	**12.52**						
State Potential Emissions				**2.39**	**10.46**			**0.69**	**3.01**		**0.33**	**1.45**

Emission Factors for grinding are from FIRE Version 6.22 for log sawing (SCC# 3-07-008-02).
Emission Factors for extrusion were obtained from studies done by the plastics industry and supplied by the applicant.
1. ABS Emission factors are obtained from Air & Waste Management Association Paper: "Sampling and Analysis of Volatile Organic Compounds Evolved during Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins", September 1995.
2. HDPE Emission factors are obtained from Air & Waste Management Association Paper: "Development of Emission Factors for Polyethylene Processing", June, 1996.

Appendix A: Emissions Calculations
VOC, CO and Particulate
From Extruder and Grinder Operations

Company Name: Primex Plastics Corporation
Address City IN Zip: 1235 North F Street, Richmond, Indiana 47374
MSOP: 177-12874-00065
PIt ID: 177-00065
Reviewer: Linda Quigley/EVP
Date: March 28, 2003

			Particulate Matter				VOC			CO		
Equipment	Resin	Maximum Rate lbs/hr	Emission Factor lbs/MMlbs	Potential lbs/hr	Potential tons/yr	Allowable lbs/hr	Emission Factor lbs/MMlbs	lbs/hr	tons/yr	Emission Factor lbs/MMlbs	lbs/hr	tons/yr
Plant 3 and 4												
Extruder 1	PP	600	650	0.39	1.71	1.83	820	0.49	2.16	90	0.05	0.24
Extruder 2	Polyester	775	30	0.02	0.10	2.17	35	0.03	0.12	50	0.04	0.17
Extruder 3	Polyester	775	30	0.02	0.10	2.17	35	0.03	0.12	50	0.04	0.17
Extruder 4	HDPE	650	30	0.02	0.09	1.93	35	0.02	0.10	50	0.03	0.14
Extruder 5	HDPE	850	30	0.03	0.11	2.31	35	0.03	0.13	50	0.04	0.19
Mega Extruder	HDPE	4000	30	0.12	0.53	6.52	35	0.14	0.61	50	0.20	0.88
Total P3 and P4 Extruders		**7650**		**0.60**	**2.64**	**16.93**		**0.74**	**3.24**		**0.41**	**1.78**
			lbs/ton									
Grinder P1		240	0.35	0.04	0.18	0.99						
Grinder P2		620	0.35	0.11	0.48	1.87						
Grinder P3		260	0.35	0.05	0.20	1.05						
Grinder P4		340	0.35	0.06	0.26	1.25						
Grinder P5		1600	0.35	0.28	1.23	3.53						
Total P3 and P4 Grinders		**3060**		**0.54**	**2.35**	**8.69**						
State Potential Emissions				**1.14**	**4.98**			**0.74**	**3.24**		**0.41**	**1.78**

Emission Factors for grinding are from FIRE Version 6.22 for log sawing (SCC# 3-07-008-02).
Emission Factors for extrusion were obtained from studies done by the plastics industry and supplied by the applicant.
1. Polypropylene Emission factors are obtained from Air & Waste Management Association Paper: "Development of Emission Factors for Polypropylene Processing", January, 1999.
2. HDPE and Polyester Emission factors are obtained from Air & Waste Management Association Paper: "Development of Emission Factors for Polyethylene Processing", June, 1996.

Appendix A: Emissions Calculations
VOC, CO and Particulate
From Extruder, Grinder and Pelletizer Operations

Company Name: Primex Plastics Corporation
Address City IN Zip: 1235 North F Street, Richmond, Indiana 47374
MSOP: 177-12874-00065
Plt ID: 177-00065
Reviewer: Linda Quigley/EVP
Date: March 28, 2003

			Particulate Matter				VOC			CO		
Equipment	Resin	Maximum Rate lbs/hr	Emission Factor lbs/MMlbs	Potential lbs/hr	Potential tons/yr	Allowable lbs/hr	Emission Factor lbs/MMlbs	lbs/hr	tons/yr	Emission Factor lbs/MMlbs	lbs/hr	tons/yr
Plant 5												
Extruder 1	PP/PE	250	650	0.16	0.71	1.02	820	0.21	0.90	90	0.02	0.10
Extruder 2	PP/PE	250	650	0.16	0.71	1.02	820	0.21	0.90	90	0.02	0.10
Extruder 3	PP/PE	250	650	0.16	0.71	1.02	820	0.21	0.90	90	0.02	0.10
Extruder 4	PP/PE	250	650	0.16	0.71	1.02	820	0.21	0.90	90	0.02	0.10
Extruder 5	PP/PE	250	650	0.16	0.71	1.02	820	0.21	0.90	90	0.02	0.10
Extruder 6	PP/PE	250	650	0.16	0.71	1.02	820	0.21	0.90	90	0.02	0.10
Extruder 7	PP/PE	250	650	0.16	0.71	1.02	820	0.21	0.90	90	0.02	0.10
Pelletizer	PP/PE	370	650	0.24	1.05	1.32	820	0.30	1.33	90	0.03	0.15
Total P5 Extruders		**2120**		**1.38**	**6.04**	**8.46**		**1.74**	**7.62**		**0.19**	**0.84**
			lbs/ton									
Grinder 1		140	0.35	0.02	0.11	0.69						
Grinder 2		140	0.35	0.02	0.11	0.69						
Grinder 3		140	0.35	0.02	0.11	0.69						
Grinder 4		140	0.35	0.02	0.11	0.69						
Grinder 5		140	0.35	0.02	0.11	0.69						
Total P5 Grinders		**700**		**0.12**	**0.54**	**3.45**						
State Potential Emissions				**1.50**	**6.57**			**1.74**	**7.62**		**0.19**	**0.84**

Emission Factors for grinding are from FIRE Version 6.22 for log sawing (SCC# 3-07-008-02).
Emission Factors for extrusion were obtained from studies done by the plastics industry and supplied by the applicant.
1. Polypropylene Emission factors are obtained from Air & Waste Management Association Paper: "Development of Emission Factors for Polypropylene Processing", January, 1999.

Appendix A: Emissions Calculations
HAPs
From Plastic Extruders

Company Name: Primex Plastics Corporation
Address City IN Zip: 1235 North F Street, Richmond, Indiana 47374
MSOP: 177-12874-00065
Plt ID: 177-00065
Reviewer: Linda Quigley/EVP
Date: March 28, 2003

Resin	Maximum Rate lbs/hr	HAPs	Emission Factor lbs/MMlbs	lbs/hr	tons/yr
HDPE Polyester	13,650	Formaldehyde	0.06	0.00	3.59E-03
		Acrolein	0.02	0.00	1.20E-03
		Acetaldehyde	0.05	0.00	2.99E-03
		Acrylic Acid	0.02	0.00	1.20E-03
		Propionaldehyde	0.02	0.00	1.20E-03
		Methyl Ethyl Ketone	0.02	0.00	1.20E-03
ABS	2,400	Acrylonitrile	7.79	0.02	8.19E-02
		Ethyl benzene	8.02	0.02	8.43E-02
		Styrene	126.00	0.30	1.32E+00
		Cumene	2.68	0.01	2.82E-02
		Acetophenone	9.29	0.02	9.77E-02
HIPS	8,250	Styrene	126.00	1.04	4.55E+00
PP	2,720	Formaldehyde	19.1	0.05	2.28E-01
		Acrolein	0.81	0.00	9.65E-03
		Acetaldehyde	15.8	0.04	1.88E-01
		Propionaldehyde	3.31	0.01	3.94E-02
		Methyl Ethyl Ketone	9.62	0.03	1.15E-01
Total HAPs					**6.76E+00**

Emission Factors for extrusion were obtained from studies done by the plastics industry and supplied by the applicant.
1. HDPE and Polyester Emission factors are obtained from Air & Waste Management Association Paper: "Development of Emission Fac for Polyethylene Processing", June, 1996.
2. ABS and HIPS Emission factors are obtained from Air & Waste Management Association Paper: "Sampling and Analysis of Volatile Or Compounds Evolved during Thermal Processing of Acrylonitrile Butadiene Styrene Composite Resins", September 1995. Additionally, ba Engineering judgement it is assumed that only styrene is emitted from HIPS and other HAPs pollutants do not apply.
3. Polypropylene Emission factors are obtained from Air & Waste Management Association Paper: "Development of Emission Factors for Polypropylene Processing", January, 1999.

Appendix A: Emissions Calculations
Particulate
From Pallet Construction and Scrap Cutting Operations

Company Name: Primex Plastics Corporation
Address City IN Zip: 1235 North F Street, Richmond, Indiana 47374
MSOP: 177-12874-00065
Plt ID: 177-00065
Reviewer: Linda Quigley/EVP
Date: March 28, 2003

		Particulate Matter			
Equipment	Maximum Rate lbs/hr	Emission Factor lbs/ton	Potential lbs/hr	Potential tons/yr	Allowable lbs/hr
Wood Pallets Construction	200	0.35	0.04	0.15	0.88
Plastic Scrap Cutting	200	0.35	0.04	0.15	0.88
TOTAL			**0.07**	**0.31**	

Emission Factors for wood and plastic cutting are from FIRE Version 6.22 for log sawing (SCC# 3-07-008-02).
[326 IAC 6-3-2] (Process Operations) These processes comply without the benefit of an add on control device.